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UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY

DEBT RESOLVE, INC.

Plaintiff,

v.

APOLLO ENTERPRISE SOLUTIONS,
LLC,

Defendant.

AFFIDAVIT OF CHRISTOPHER
IMREY IN RESPONSE TO
ORDER TO SHOW CAUSE RE
TRANSFER

Civil Action No. 07-103

AFFIDAVIT OF CHRISTOPHER IMREY

Christopher Imrey hereby declares:

1. I am the President and Chief Executive Officer of Apollo Enterprise Solutions, LLC ("Apollo"), the defendant in the above-captioned matter, and have held that or similar positions continuously since January, 2004. I have personal knowledge as to all matters stated herein. I submit this declaration in support of Apollo's Motion to Dismiss.

2. Apollo provides enterprise-class, hosted solutions to primary creditors, collection agencies, debt buyers and legal recovery firms for Debtor Self-Payment and Self-Settlement (often referred to as Apollo's IDS system). Apollo's IDS system lets clients offer their debtors online debt-payment and debt-settlement options that reflect the debtors' current credit status. The Apollo IDS system allows its clients to offer debtors an unlimited number of payment or settlement options. Apollo's client is the creditor not the debtor.

3. Apollo's principal place of business is in Irvine, California. Apollo does not maintain offices, facilities, local telephone listings, or bank accounts in New York or Delaware, and similarly, does not own or lease any real property or employ any persons in New York or Delaware. Apollo is not currently, nor has it ever been, qualified, authorized, or otherwise chartered, licensed or registered to conduct or do business in New York. Apollo has never designated anyone in New York to accept legal service of process on its behalf. Apollo has no such contacts with Delaware other than being incorporated as an LLC under Delaware law.

4. Apollo does not direct any of its advertising at New York or Delaware residents for any of its products, including its IDS system. Apollo has never installed or delivered the alleged infringing IDS system that is the subject of this dispute to any company or individual located in New York or Delaware.

5. Apollo is a small company with a limited number of employees. It has only 4 executive officers, all of whom work in California. If the presence of Apollo officers or senior technical employees in New York or Delaware were required for discovery, hearings or trial, litigation of this matter in New York or Delaware, it would impose a substantial burden upon Apollo and in all likelihood cause significant disruption of its operations.

6. Attached as Exhibit A is a true and correct copy of a schedule of Apollo's members. The vast majority of the members are residents of California, including individuals, California corporations and California private trusts. No members are residents of New Jersey or Delaware. A single member owning a 1/10th of 1 percent interest in Apollo is a resident of New York.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on February 28, 2007 at Irvine, California.

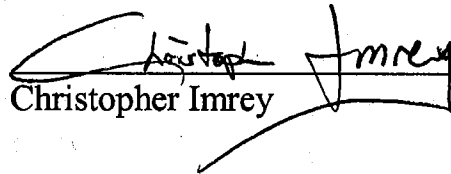

Christopher Imrey

Exhibit A

Apollo Enterprise Solutions, LLC
Member Citizenship

Member	Type	City	State
1	Individual	Newport Beach	CA
2	Individual	Corona del Mar	CA
3	Trust	Boston	MA
4	Individual	Claremont	CA
5	Individual	North Palm Beach	FL
6	Individual	Irvine	CA
7	LP	Newport Coast	CA
	Individual	Newport Coast	CA
8	Individual	Huntington Beach	CA
9	Individual	Huntington Beach	CA
10	Trust	Newport Coast	CA
11	California Public Benefit Corp.	Walnut Creek	CA
12	Trust	Pebble Beach	CA
13	California Corporation	Westminster/Huntington Beach	CA
14	California Corporation	Westminster	CA
15	Individual	Irvine	CA
16	Individual	Irvine	CA
17	Individual	Corona del Mar	CA
18	Individual	New York	NY
19	Individual	Irvine	CA
20	Individual	Toluca Lake	CA
21	Individual	Fresno	CA
22	LLC	Visalia	CA
	Individual	Costa Mesa	CA
	Individual	Clovis	CA
	Individual	Visalia	CA
	Individual	Oakland	CA
	Individual	Oakland	CA
	Individual	Oakland	CA
	Individual	Seal Beach	CA
	Individual	Pismo Beach	CA
	Individual	Oakland	CA
	Individual	Fresno	CA
	Individual	Las Vegas	NV
	Individual	Panama City	Panama
	Individual	Las Vegas	NV
23	LLC	Visalia	CA
	Individual	Kihel	HI
	Individual	Chula Vista	CA
	Individual	Pismo Beach	CA
	Individual	San Jose	Costa Rica
	Individual	Reno	CA
24	LLC	Visalia	CA
	Individual	Pismo Beach	CA
25	LP	Pismo Beach	CA
	Individual	Pismo Beach	CA
	Individual	Pismo Beach	CA
	Individual	Belingham	WA
26	Trust	Laguna Beach	CA
27	Trust	Laguna Beach	CA